

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ALGETERNAL TECHNOLOGIES, LLC,	§	
MILTON HUGHES MORRIS, AND KATON	§	
MORRIS	§	
v.	§	
DAVID RAMJOHN, BRUCE DOPSLAUF,	§	CIVIL ACTION NO. 4:17-CV-02667
BK COOK FAMILY, LP,	§	
BRIAN COOK, ARTHUR DAY, M.D.,	§	JURY DEMANDED
W.A. SANFORD, 5X5, SBS HOLDINGS, LP,	§	
HOCHBURG HOLDINGS, LP,	§	
DONALD MEINERS,	§	
ANNA KATHERINE SCHMIDT	§	
AND ROB EISSLER	§	

DEFENDANT ALGETERNAL'S MOTION FOR AWARD OF ATTORNEY'S FEES

TO THE HONORABLE JUDGE OF SAID COURT:

Defendants David Ramjohn, et. al. ("Defendants") hereby file this Motion for Entry of Award of Attorneys' Fees and would show the Court as follows:

1. Pursuant to the Order signed on June 25, 2018 [Doc. 30], Defendants request that the Court enter an award of attorneys' fees and costs. Attached hereto as Exhibit A is the Affidavit of Chris Hanslik establishing that the reasonable and necessary attorneys' fees and costs incurred by Defendants from February 1, 2018 through June 30, 2018 are \$33,083.40. Accordingly, Defendants request that the Court enter an award of attorneys' fees and costs in the amount as established by the attached affidavit.

PRAYER

Based on the foregoing, Defendants David Ramjohn, et. al. respectfully request that the Court award attorneys' fees and costs in favor of Defendants in the amount of \$33,083.40. Defendants also request such other and further relief to which he may justly be entitled.

Respectfully submitted,

BOYARMILLER

By: /s/ Chris Hanslik

Chris Hanslik
State Bar No. 00793895
Federal ID No. 19249
chanslik@boyarmiller.com
2925 Richmond Ave, 14th Floor
Houston, Texas 77098
Telephone: (713) 850-7766
Facsimile: (713) 552-1758

ATTORNEY-IN-CHARGE FOR DEFENDANTS DAVID RAMJOHN, et al.

OF COUNSEL:

Andrew Pearce
State Bar No. 24060400
Federal ID No. 919001
apearce@boyarmiller.com
Craig Lauchner
State Bar No. 24102066
Federal ID No. 3016907
clauchner@boyarmiller.com
BOYARMILLER
2925 Richmond Ave. 14th Floor
Houston, Texas 77098
Telephone: (713) 850-7263
Facsimile: (713) 552-1758

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of July, 2018, I electronically filed the foregoing pleading with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Chris Hanslik